

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MARTIN SHKRELI, EVAN GREEBEL,
MSMB CAPITAL MANAGEMENT LLC,
and MSMB HEALTHCARE
MANAGEMENT LLC,

Defendants.

No. 1:15-cv-07175 (KAM) (JRC)

MOTION FOR EXTENSION OF TIME

DL Software D/B/A/ Godel Terminal (“DL Software”), by and through undersigned counsel, respectfully requests an extension of time for DL Software’s answer to the Securities and Exchange Commission’s (the “SEC” or “government”) Writ of Continuing Garnishment (the “Writ”) (ECF No. 69). Specifically, DL Software asks that the Court extend its deadline to respond until August 29, 2025.

The Writ was issued by the Court on July 31, 2025. The Writ, pursuant to 28 U.S.C. § 3205(c)(2)(E), established August 9, 2025 as the date for DL Software to answer. DL Software asks that the date for it to respond by be extended to August 29, 2025. DL Software just retained undersigned counsel and requires additional time to confer with said counsel and the government regarding its answer to the Writ. This is DL Software’s first request for an extension of the time in this matter. This extension will not affect any other presently scheduled Court deadline or appearance.

On August 5, 2025, undersigned counsel conferred with counsel for the government. The government does not object to DL Software's requested extension. On August 6, 2025, undersigned counsel attempted to meet and confer with counsel for Mr. Greebel and Mr. Shkreli (as listed on CM/ECF) but was unable to substantively connect with them before the Court's rules required this motion to be filed. The MSMB entities are listed as *pro se*, undersigned counsel is presently unaware of how to contact them and thus could not meet and confer with them regarding this motion.

Therefore, DL Software asks that the Court order the time by which it must answer the Writ extended from August 9 to August 29, 2025.

Dated: August 6, 2025

Respectfully submitted,

/s/ William McGovern

William McGovern (NY Bar No. 2611580)

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